

# S T O L L · K E E N O N · O G D E N

2000 PNC Plaza 500 West Jefferson Louisville, KY 40202 (502) 333-6000 Fax: (502) 333-6099 www.skofirm.com

Douglas F. Brent (502) 568-5734 douglas.brent@skofirm.com

February 19, 2009

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PUBLIC SERVICE
COMMISSION

Mr. Jeff Dereoun Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: 2007-00004—Rural Local Carriers v. Windstream KY East

Dear Mr. Dereoun:

Enclosed please find an original and ten copies of data requests to Windstream Kentucky East, LLC being filed on behalf of Intervenors NuVox Communications, T-Mobile, and tw telecom of ky llc. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely yours,

STOLL KEENON OGDEN, PLLC

Douglas F. Brent

Enc.

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### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

BECENTED

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In the Matter of:			FE	B 2 0 2009
	Brandenburg Telephone Company; Duo County Telephone Cooperative Corporation, Inc.; Highland Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative Corporation, Inc.; North Central Telephone Cooperative Corporation; South Central Telephone Cooperative Corporation, Inc.; and West Kentucky Rural Telephone Cooperative Corporation, Inc.  Complainants v.  Windstream Kentucky East, LLC  Defendants	,	PUI C ASE NO. 07-00004	BLIC SERVICE OMMISSION
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## **REQUEST FOR INFORMATION**

NuVox Communications, Inc., T-Mobile USA, Inc., Powertel/Memphis, Inc., T-Mobile Central LLC and tw telecom of ky llc, (hereinafter collectively "Intervenors") propound the following requests for information to Windstream Kentucky East, LLC ("Windstream").

#### INSTRUCTIONS

Each response shall be answered under oath or be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Defendant shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which the Defendant fails or

refuses to furnish all or part of the requested information, Defendant shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. With respect to the cost study included as Appendix A to Windstream's Motion for Confidential Treatment filed December 4, 2007, does the cost study include embedded costs?
- 2. Please identify each person responsible for creation of the cost study, including their employer and job title.
- 3. Please admit that Windstream is obligated to provide transit service to Intervenors at rates based on forward-looking economic costs as determined by the methodology set forth in §§ 51.505 and 51.511 of the Federal Communications Commission's rules, 47 C.F.R. §§ 51.505 and 51.511.
- 4. Please provide a copy of the cost study.

Respectfully submitted,

Douglas F. Brent

STOLL, KEENON OGDEN PLLC

2000 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202

Telephone: (502) 333-6000

Counsel for NuVox Communications, Inc.,

T-Mobile USA, Inc., Powertel/Memphis, Inc.,

T-Mobile Central LLC and tw telecom of ky llc

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Request for Information has been served by United States Mail on those persons whose names appear below this 19th day of February, 2009.

Douglas F. Brent

Mark R. Overstreet STITES & HARBISON, PLLC 421 West Main Street Frankfort, KY 40602-0634

Daniel Logsdon Vice President External Affairs Windstream Kentucky East, LLC 130 West New Circle Road P.O. Box 170 Lexington, Kentucky 40505

Holly Wallace Dinsmore & Shohl, LLP 1400 PNC Plaza 500 West Jefferson Street Louisville, Kentucky 40202

Dennis G. Howard II
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40601-8204

John N. Hughes 124 West Todd Street Frankfort, Kentucky 40601